

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

JAYLA ALLEN, et al.,

*Plaintiffs,*

v.

WALLER COUNTY, TEXAS, et al.,

*Defendants.*

Civil Case No. 4:18-cv-3985

**DECLARATION OF ROBERT STEIN, Ph.D.**

In accordance with 28 U.S.C. § 1746, Rules 26(a)(2)(B) and 26(e) of the Federal Rules of Civil Procedure, and Rules 702 and 703 of the Federal Rules of Evidence:

1. My name is Robert Stein. I serve as an expert for Plaintiffs. I have filed reports in this matter, which have been disclosed to Defendants and filed on the public docket.<sup>1</sup>

2. I am submitting this declaration to correct a factual error in my initial report. The error does not affect my analysis or conclusions, but I wish to correct it for accuracy.

3. On pages 7–8 of my initial report, I stated: “The closest early voting location to the PVAMU campus—apart from the on-campus early voting location at the Memorial Student Center (MSC)—was the off-campus early voting location at the Waller County Community Center. However, the Community Center is located to the south of the PVAMU campus, 1.4 to 1.6 miles away from two large student residential housing facilities on the

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<sup>1</sup> Stein Report, ECF 77-1 at 172–205; Stein Rebuttal Report, *id.* at 207–17.



PVAMU campus (i.e., University Square, located at 502 Anne Preston Street, and University College, located at 505 Anne Preston Street). This distance is five to six times further than the minimum distance beyond which Cantoni observed reduced voter turnout.” ECF 77-1 at 178–79.

4. In preparing for trial, I discovered the distances I reported were incorrect. The Waller County Community Center (WCCC) is approximately 1 mile—not 1.4 miles—from University Square, and approximately 1.1 miles—not 1.6 miles—from University College. It remains true that these distances are greater than 0.25 miles, the minimum distance beyond which Enrico Cantoni reported a deterrent effect on voting. *See* ECF 77-1 at 178.

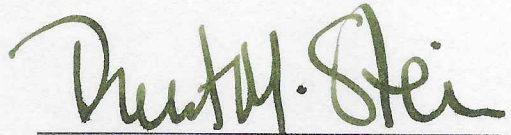
5. With these errors corrected, the amended paragraph reads as follows: “The closest early voting location to the PVAMU campus—apart from the on-campus early voting location at the Memorial Student Center (MSC)—was the off-campus early voting location at the Waller County Community Center. However, the Community Center is located to the south of the PVAMU campus, 1 to 1.1 miles away from two large student residential housing facilities on the PVAMU campus (i.e., University Square, located at 502 Anne Preston Street, and University College, located at 505 Anne Preston Street). This distance is approximately four times further than the minimum distance beyond which Cantoni observed reduced voter turnout.”

\* \* \*

I reserve the right to continue to supplement my declarations in light of additional facts, testimony, and/or materials that may come to light.

Pursuant to 28 U.S.C. 1746, I declare under penalty of perjury of the laws of the United States that the foregoing is true and correct according to the best of my knowledge, information, and belief.

Executed on September 10, 2020

A handwritten signature in dark ink, appearing to read "Robert M. Stein", written over a horizontal line.

ROBERT M. STEIN, Ph.D.